

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Burlington Industries Cheraw - PRP Lead - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #2  
April Update  
Burlington Industries Cheraw - PRP Lead  
B49F  
Cheraw, SC  
Latitude: 34.6977213 Longitude: -79.9146074

**To:** James Webster, USEPA R4 ERRPB

**From:** Matthew Huyser, On Scene Coordinator

**Date:** 4/17/2018

**Reporting Period:** 3/13/2018-4/17/2018

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B49F	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	9/20/2017
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Assessment
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	2/19/2018	<b>Start Date:</b>	2/19/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	SCN000404896	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time-critical removal action; PRP oversight

#### 1.1.2 Site Description

See POLREP #1 dated 3/12/2018 for Site Description information.

##### 1.1.2.1 Location

See POLREP #1 dated 3/12/2018 for Location information.

##### 1.1.2.2 Description of Threat

See POLREP #1 dated 3/12/2018 for Description of Threat information.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1 dated 3/12/2018 for Preliminary Removal Assessment and Removal Site Inspection Results information.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

Highland and their technical contractor hosted an "optional pre-bid meeting" on 3/29/2018 during which prospective contractors visited the Site, discussed the scope of work, and discussed logistics or other potential issues related to the removal action. According to the schedule in the approved Removal Action Work Plan (RAWP), removal contractor selection is scheduled for June 8, 2018.

During the week of April 2nd, Highland's technical contractor collected additional samples from the Highland property and in Huckleberry Park. The additional sample locations were selected to provide better resolution on a potential excavation area. The contractor collected samples from 22 additional locations in Huckleberry Park and 19 additional locations from the Highland Industries property. Samples were collected at 12-inch intervals per location.

The EPA Superfund Technical Assessment and Response Team (START) contractor mobilized to collect split samples from locations in Huckleberry Park. Split sample collection rate for sample handling and analysis verification remains at 10%. START collected 8 split samples (which includes one duplicate). Electronic data has been received from Highlands contractor for the first sample event and will be evaluated against the EPA data.

#### 2.1.2 Response Actions to Date

- Submission of RAWP, FSAP, QAPP, and HASP
- Assessment and delineation sample collection
- Additional assessment and delineation sample collection

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

An Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action was signed between EPA and Highland Industries for a removal action at the Site.

### 2.1.4 Progress Metrics

There has been no waste removed from the Site under the PRP-lead removal action

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

Highland's contractor has provided a work schedule under the final RAWP which is enforceable under the consent agreement. The upcoming tasks in the schedule are listed below:

TASK	START - END
Laboratory Analysis	2/6/2018 - 4/13/2018
Sample Data Review, Validation, and Compilation	3/26/2018 - 4/30/2018
Final Excavation Limits to be Defined	4/30/2018 - 4/30/2018
Prepare Request for Proposal (RFP)	4/6/2018 - 5/7/2018
Submit RFP to Contractors	5/8/2018 - 5/8/2018
Proposal Timeline	5/8/2018 - 6/4/2018
Proposal Review	6/4/2018 - 6/8/2018
Contractor Selection / Award	6/8/2018 - 6/8/2018

#### 2.2.1.1 Planned Response Activities

- Assessment and delineation of surface and subsurface soils and sediments; (ONGOING)
- Excavate soils/sediments exceeding 1 ppm total PCBs to a depth of up to 24 inches;
- Install engineered controls to prevent the transport of any PCBs from the excavated areas;
- Remove waste materials for proper treatment, recycling, and/or disposal;
- Restore areas impacted by the removal action to appropriate pre-removal conditions; and,
- Implement post-removal site controls in "Low Occupancy Area" where total PCB exceeds 1 ppm.

#### 2.2.1.2 Next Steps

Highland's contractor will complete laboratory analysis, data review, and delineation of excavation limits from the samples that were collected.

EPA's START contractor will complete laboratory analysis of split sample data and review the results against data collected by Highland to measure relative percent difference (RPD) between corresponding samples. A RPD of less than 50% means that frequency of split sampling for confirmation can be reduced to a rate of 5%.

### 2.2.2 Issues

There is no information to provide in this section.

## 2.3 Logistics Section

There is no information to provide in this section.

## 2.4 Finance Section

### 2.4.1 Narrative

EPA will be using START to assist with oversight of PRP activities, including documentation, photographs, and sample collection. Approximately \$72,000 of the total START costs to date were expended during the fund-lead removal action in 2017.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
TAT/START	\$100,000.00	\$96,000.00	\$4,000.00	4.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$100,000.00</b>	<b>\$96,000.00</b>	<b>\$4,000.00</b>	<b>4.00%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

There is no information to provide in this section.

#### **2.5.2 Liaison Officer**

There is no information to provide in this section.

#### **2.5.3 Information Officer**

There is no information to provide in this section.

### **3. Participating Entities**

#### **3.1 Unified Command**

There is no information to provide in this section.

#### **3.2 Cooperating Agencies**

There is no information to provide in this section.

### **4. Personnel On Site**

Personnel have demobilized from the Site at the time of this report. Personnel for sampling included:

Highland (1-3)

Highland contractor (4)

START (1)

### **5. Definition of Terms**

There is no information to provide in this section.

### **6. Additional sources of information**

#### **6.1 Internet location of additional information/report**

There is no information to provide in this section.

#### **6.2 Reporting Schedule**

Progress reports will be submitted by Highland's contractor on a monthly basis. POLREPs will be generated and submitted monthly as well.

### **7. Situational Reference Materials**

There is no information to provide in this section.